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9 **Attorneys for Plaintiff Lisa Black**

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11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE NORTHERN MARIANA ISLANDS**

13 **LISA BLACK,** ) **CIVIL ACTION NO. 05-0038**  
14 **Plaintiff,** )  
15 **vs.** )  
16 **JIM BREWER, individually and in his** )  
**official capacity as Acting Principal for** )  
**Hopwood Junior High School,** )  
**COMMONWEALTH OF THE NORTHERN** )  
**MARIANA ISLANDS PUBLIC SCHOOL** )  
**SYSTEM, and JOHN AND/OR JANE DOE,** )  
17 **Defendants.** )  
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) **SECOND MOTION TO COMPEL**  
Date: August 24, 2006  
Time: 9:00 a.m.  
Judge: Munson

19 Plaintiff, by and through counsel and pursuant to Fed.R.Civ.P. 37 and LR 16.2CJ(d)(1),  
20 hereby moves this honorable Court for an Order compelling Defendant CNMI Public School  
21 System (“PSS”) to serve upon Plaintiff an amended response to Plaintiff’s Second Set of  
22 Interrogatories and Request for Admissions and Special Interrogatory. Plaintiff also moves,  
23 pursuant to the aforementioned rules, for an Order compelling Defendant Jim Brewer (“Mr.  
24 Brewer”) to serve upon Plaintiff an amended response to Plaintiff’s Third Set of Production of  
25 Documents, Third Set of Interrogatories and Request for Admission and Special Interrogatory.  
26 The initial responses by PSS and Mr. Brewer are unresponsive and/or improperly withhold  
27 information or documents as explained in more detail in Plaintiff’s Memorandum In Support of  
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1 this Motion filed herewith. Therefore, Plaintiff moves this Court for an Order compelling PSS  
2 and Mr. Brewer to provide responsive answers and/or documents in response to these various  
3 discovery requests and to pay the costs and attorney fees associated with bringing this Motion.  
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5 Respectfully submitted this 7<sup>th</sup> day of August, 2006:  
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7 O'CONNOR BERMAN DOTT & BANES  
8 Attorneys for Plaintiff Lisa Black  
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